



48 Wall Street, Suite 11, Manhattan, NY 10005

March 11, 2020

VIA ELECTRONIC MAIL

Honorable Vernon S. Broderick
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: Colon v. The City of New York, et al. No. 16-CV-4540
Williams v. The City of New York, et al. No. 16-CV-8193**

Dear Judge Broderick:

The Florestal Law Firm, PLLC is counsel to Sibyl Colon and Allison Williams (hereinafter, the “Plaintiffs”), in the above referenced matter. Plaintiffs submit their letter in opposition to NYCHA Defendants’ letter dated March 10, 2020, requesting permission to deviate from this Court’s Rules in order to file a total of six (6) declarations in opposition to Plaintiff Sibyl Colon’s summary judgment motion. The relevant rule makes it clear that all parties are limited to five (5) declarations, unless good cause is shown. NYCHA Defendants have not articulated any good cause as to why they should not be held to the same standard as any other attorney who practices before this Court. In allowing attorneys to deviate from these established rules, this Court risks encouraging attorneys to engage in litigating minutiae in a balkanized fashion which, arguably, is one of the conclusions this rule was meant to avoid. We ask this Court to reject NYCHA Defendants’ request and hold them to the same standard applicable to all attorneys.

Respectfully,

/s/ Marcel Florestal

cc: All counsel via electronic mail.